

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <hr/> <b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
---	---

**JOINT MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Sean McCrary  
Sean McCrary  
Tonya L. Melnichenko  
Franklin D. Azar & Associates  
14426 East Evans Avenue  
Aurora, CO 80014  
(303) 757-3300  
melnichenkot@fdazar.com  
*Counsel for Plaintiffs*

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
william.gage@butlersnow.com

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338

(304) 414-1800  
srobinson@tcspllc.com  
*Counsel for the Ethicon Defendants*

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

**EXHIBIT A**

<b>Civil Action No.</b>	<b>Case Style</b>
2:12-cv-08429	Linda J. Craven and Scott A. Craven v. Ethicon, Inc.; Johnson & Johnson
2:13-cv-03616	Monica Rose Bertsch and Shane Thomas Bertsch v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-03881	Janice J. Hennessy and William Hennessy v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-03959	Jamie A. Nevarez v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-04149	Christine Chamberlin and Allen Chamberlin v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-06772	Lucinda Renee Edge v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-07677	Vernetta L. Washburn v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-24220	Antonette Trujillo and Raymond Trujillo v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27310	Janell Fiscus v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27315	Karen L. Getchell v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-27326	Bonita Jo Leininger and George H. Leininger v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-28793	Elsie C. Fernandez and Antonio Fernandez v. Ethicon, Inc.